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RECEIVED

OF COUNSEL
MARJORIE GILMAN BAKER
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REPLY TO:

Cranford

January 20, 1997

Amelia Wagner
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 1007-1866

Re: Congoleum Corporation -- Passaic River Study/
Diamond Alkali Superfund Site
Our File No: 6378

Dear Ms. Wagner:

This will confirm our recent telephone conversations concerning the above matter. As you know, we represent Congoleum Corporation and have been retained to represent Congoleum in responding to the CERCLA 104(e) Request for Information recently served on it.

As I mentioned to you, Congoleum Corporation ceased manufacturing operations at its former Kearny facility in the early 1960s and sold the property in the mid 1970s. In addition, since then, the company has gone through a number of ownership changes and corporate restructuring. For these reasons, documents and information requested are not readily at hand and it is more than likely that more than thirty days will be required to respond to the 104(e) Request.

As per our conversations, we will provide you with as much information as we can by the due date, which I calculate to be January 27, 1997, with the understanding that we may be contacting you to request additional time to provide additional information that we have been unable to secure by such date.

As per our conversations, please forward a list of the companies to whom EPA has sent 104(e) Requests as well as a list of companies who have received PRP Notice Letters.

846540001

DUGHI AND HEWIT

Amelia Wagner

Re: Congoleum Corporation -- Passaic River Study/
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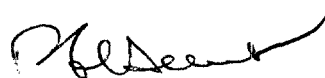
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I have had the opportunity to discuss this matter with the attorneys for Chemical Land Holdings and appreciate your referring me to them.

Thank you for your cooperation.

Sincerely yours,

DUGHI AND HEWIT

A handwritten signature in dark ink, appearing to read "Russell L. Hewit", with a stylized flourish at the end.

Russell L. Hewit

K120RLH

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